

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ORANGEBURG DIVISION

UNITED STATES OF AMERICA

v.

JOEL PERRIN ROBINSON

Criminal Action No.

5:14-CR-809

**GOVERNMENT'S NOTICE OF INTENT TO INTRODUCE  
EVIDENCE UNDER RULE 404(B)**

The United States of America, by Sally Quillian Yates, United States Attorney for the Northern District of Georgia, and Michael Herskowitz and Vivek Kothari, Special Assistant United States Attorneys for the District of South Carolina, files this Notice of Intent to Introduce Evidence Under Rule 404(b) of the Federal Rules of Criminal Procedure at the trial of the defendant, Joel Perrin Robinson, and states as follows:

1. In the present case, Robinson has entered a not guilty plea to the indictment, denying that he conspired to possess with the intent to distribute and manufacture a controlled substance (namely PCP) as alleged in the indictment. As such, Robinson has placed the element of his knowing possession of the narcotics at issue in this case.
2. A subject named Marion Mack, who is a defendant in a case pending in this District, would testify that he purchased a total of 30 to 70 pounds of marijuana from Robinson on six or seven different occasions in 2007 and 2008. Mack would further testify that in 2010, on two different occasions, Mack purchased a kilogram of cocaine

from Robinson at the cost of \$28,000 to \$30,000 per kilogram. Both cocaine transactions occurred at Robinson's place of employment – Orangeburg Collision.

3. Although intrinsic to the charged indictment, the Government further places Robinson notice in an abundance of caution that Mack is expected to testify that Robinson made statements to Mack in 2007 or 2008 regarding a trailer of chemicals belonging to Robinson which was stolen from outside a hotel.

4. In addition, a subject named James Goins, who is a defendant in a pending case in Texas, is expected to testify that he traveled to Texas in 2008 at the behest of Robinson in order to pick up drugs. After the authorities seized the marijuana from Goins, Goins contacted Robinson and advised that "they got everything." Goins is also expected to testify (intrinsic to the indictment) that he and Robinson picked up buckets in Atlanta which may have contained chemicals.

5. The Government hereby places Robinson on notice that it will attempt to introduce evidence of the foregoing drug trafficking conduct at trial under Rule 404(b) as proof of identity, intent, knowledge, and absence of mistake/accident with respect to his knowing possession with the intent to distribute or manufacture the narcotics at issue in this case.

6. The Government will supplement this notice with a brief supporting the introduction of this evidence prior to trial.

Respectfully submitted,

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**Certificate of Service**

I served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

Richard Harpootlian

James Griffin

December 30, 2014

/s/ MICHAEL V. HERSKOWITZ

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